UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

MAY - 3 2017

U. S. DISTRICT COURT EASTERN DISTRICT OF MO ST. LOUIS

UNITED STATES OF AMERICA,	
Plaintiff,))
v.) No.
JAMES MAXWELL BARNETT AND ANGELA PARROTT,	4:17CR00193 CDP/JMB
Defendants.))

INDICTMENT

COUNT 1

(Possession of 15 or More Unauthorized Access Devices)

The Grand Jury charges that:

On or about April 25, 2017, in the Eastern District of Missouri, the defendants,

JAMES MAXWELL BARNETT AND ANGELA PARROTT,

being aided, abetted, counseled and induced by one another, in a matter affecting interstate commerce, did knowingly and with intent to defraud possess more than fifteen unauthorized access devices, that is: more than 100 counterfeit drivers licenses, counterfeit credit/debit cards, social security numbers, and fraudulently obtained gift cards and prepaid debit cards.

In violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

COUNTS 2 THROUGH 9

(Possession of Device-Making Equipment)

The Grand Jury further charges that:

On or about April 25, 2017, in the Eastern District of Missouri, the defendants,

JAMES MAXWELL BARNETT AND ANGELA PARROTT,

being aided, abetted, counseled and induced by one another, in a matter affecting interstate commerce, did knowingly, and with intent to defraud, have custody and control over, and possess the device-making equipment listed below:

COUNT	<u>DATE</u>	DEVICE-MAKING EQUIPMENT
2	April 25, 2017	Epson Home Printer XP-330
3	April 25, 2017	Epson Home Printer XP-2550
4	April 25, 2017	Gray Computer Camera
5	April 25, 2017	Smart Pay Device Model ViVOpay 4800
6	April 25, 2017	Credit Card Embosser
7	April 25, 2017	Evolis Card Printer
8	April 25, 2017	Card Device Scanner Model MSR605X
9	April 25, 2017	Box of Blank Cards

All in violation of Title 18, United States Code, Sections 1029(a)(4) and 2.

COUNT 10

(Possession of Five or More Identification Documents)

The Grand Jury further charges that:

On or about April 25, 2017, in the Eastern District of Missouri, the defendants,

JAMES MAXWELL BARNETT AND ANGELA PARROTT,

being aided, abetted, counseled and induced by one another, in a matter affecting interstate commerce, did knowingly possess with intent to use unlawfully five or more identification documents not issued lawfully for the use of the defendant, authentication features, and false identification documents, to wit, more than ten drivers licenses in the names of others but bearing the photographs of the defendants, and appearing to have been issued by various states.

In violation of Title 18, United States Code, Section 1028(a)(3) and 2.

COUNTS 11 THROUGH 12

(Aggravated Identity Theft)

The Grand Jury further charges that:

On or about April 25, 2017, in the Eastern District of Missouri, the defendants,

JAMES MAXWELL BARNETT AND ANGELA PARROTT,

did knowingly possess, without lawful authority, a means of identification of another person, to wit, the account numbers of the individuals listed below, during and in relation to the commission of the felony offenses of: production and use of counterfeit access devices, Title 18,

United States Code, Section 1029(a)(1); production of false identification documents, Title 18, United States Code, Section 1028(a)(1); possession of five or more identification documents, Title 18, United States Code, Section 1028(a)(3); and, social security fraud, Title 42, United States Code, Section 408(a)(7)(B)

<u>COUNT</u>	<u>DATE</u>	IDENTITY
11	April 25, 2017	C.P.G.
12	April 25, 2017	B.Y.

In violation of Title 18, United States Code, Sections 1028A and 2.

A TRUE BILL.

FOREPERSON	

CARRIE A. COSTANTIN
Acting United States Attorney

TRACY BERRY, #014753 TN Assistant United States Attorney